

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re EXPRESS ENERGY SERVICES OPERATING, LP, <i>et al.</i>, Debtors.	§ § § § § § § §	Chapter 11 Case No. 09-38044 Jointly Administered
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**DEBTORS' WITNESS AND EXHIBIT LIST
FOR HEARING ON DECEMBER 1, 2009**

WITNESSES

Express Energy Services Operating, LP, and its affiliated debtors, as debtors and debtors in possession (collectively, the “**Debtors**”), may call any of the following witnesses, whether in person or by proffer, at the hearing to be held on December 1, 2009, at 4:30 p.m. (prevailing Central Time) (as may be continued, the “**Hearing**”):

- A. Darron Anderson, Chief Executive Officer of the Debtors; and
- B. Any witnesses necessary to rebut the testimony of witnesses called or designated by any other party.

EXHIBITS

The Debtors may offer into evidence any one or more of the following exhibits at the Hearing:

Exhibit	Description	Offered	Objection	Admitted	Date	Disposition
1	Declaration of Darron Anderson In Support of the Debtors' <u>Ex Parte</u> Emergency Motion Pursuant to Section 107(b)(1) of the Bankruptcy Code and Bankruptcy Rule 9018 for an Order Redacting Confidential Commercial Information From Schedules and Statements Filed in Accordance with Section 521 of the Bankruptcy Code and Bankruptcy Rule 1007					

Exhibit	Description	Offered	Objection	Admitted	Date	Disposition
2	Schedules and Statements of Financial Affairs for Express Energy Services Operating, LP (Case No. 09-38044)					
3	Schedules and Statements of Financial Affairs for Express Energy Services, CT, LP (Case No. 09-38053)					
4	Schedules and Statements of Financial Affairs for Express Energy Services Ark, LP (Case No. 09-38054)					
5	Schedules and Statements of Financial Affairs for Express Energy Services P&A, LP (Case No. 09-38055)					
6	Schedules and Statements of Financial Affairs for Express Energy Services WL, LP (Case No. 09-38057)					
7	Schedules and Statements of Financial Affairs for R&S Tong Services, Ltd. (Case No. 09-38066)					
8	Schedules and Statements of Financial Affairs for D&D Tongs, L.P. (Case No. 09-38070)					

The Debtors reserve the right to supplement or amend this witness and exhibit list at any time prior to the Hearing.

Dated: December 1, 2009
Houston, Texas

Respectfully submitted,

/s/ Alfredo R. Pérez
Alfredo R. Pérez (15776275)
WEIL, GOTSHAL & MANGES LLP
700 Louisiana Street, Suite 1600
Houston, Texas 77002
Telephone: (713) 546-5000
Facsimile: (713) 224-9511

Attorneys for Debtors and Debtors in Possession